

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

NATIONAL ASSOCIATION OF
IMMIGRATION JUDGES, affiliated with the
International Federation of Professional and
Technical Engineers,

Plaintiff,

v.

JAMES R. MCHENRY III, in his official
capacity as Director of the Executive Office
for Immigration Review,

Defendant.

Civil Action No. 20-cv-731

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff National Association of Immigration Judges respectfully moves for a preliminary injunction enjoining Defendant and his officers and agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of the injunction, from enforcing the policy of the Executive Office for Immigration Review (“EOIR”) dated January 2020 and titled “Submission and Processing of Request for Speaking Engagements”—and, to the extent it remains operative, the policy of EOIR dated September 2017 and titled “Speaking Engagement Policy for EOIR Employees.” As set forth in the accompanying memorandum of law, a preliminary injunction is warranted because Plaintiff is likely to succeed on the merits of its claims, Plaintiff’s members are likely to suffer irreparable harm without the preliminary injunction, the balance of equities tips in Plaintiff’s favor, and the injunction is in the public interest.

July 1, 2020

Respectfully submitted,

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**pro hac vice* application forthcoming

Counsel for the Plaintiff